

#### TIPS FOR PREPARING AN O&M PLAN

#### 1. Do not submit the manufacturer's O&M Plan.

The manufacturer's O&M Plan does not include everything the Air Quality Department requires and includes much more that we don't require, such as startup and shutdown procedures, spare parts inventory, and troubleshooting.

#### 2. Read and follow the O&M Plan Guidelines.

The guidelines should contain all the instructions and templates necessary to complete an O&M Plan. The operations log sheets and maintenance checklists should also prove to be useful. We have attempted to simplify the process as much as possible.

### 3. Submit a separate O&M Plan for each unique control device that requires an O&M Plan.

Combining different control devices into one O&M Plan leads to confusion for everyone. Having separate O&M Plans allows for changes in one plan without having to resubmit all O&M Plans.

## 4. Do not submit an O&M Plan for equipment that does not require one.

This sounds simple but it happens. It involves extra work for both the facility and the Department. If you are unsure about an O&M Plan requirement, contact Business Assistance at 602-506-5102 or the Permitting Division.

# 5. Check your permit conditions for specific requirements such as parameters, limits, training requirements, etc...

Permit conditions may specify particular parameters that shall be monitored; specific limits such as a minimum combustion temperature or training requirements to be included in the O&M Plan.

# 6. Be sure that operating parameters have reasonable upper and/or lower limits.

Limits that are too restrictive (3.0 to 3.5 inches  $H_2O$ ) may be difficult to meet, whereas limits that allow too broad of an operating range (1 to 10 inches  $H_2O$ ) have little or no value. Also, zero is not an acceptable lower limit for pressure drop as the unit may not even be operating.

# 7. Include a cover letter with the facility contact information.

Any questions that arise during the review of an O&M Plan can be addressed to the appropriate facility representative, as can the review letter.

## 8. If an approved O&M Plan must be changed, submit the revised O&M Plan in its entirety.

This will ensure everyone has a complete, up-to-date copy of the plan. The cover letter should identify the changes made and the reason(s) for the changes.